

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

14-MD-2543 (JMF)

GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

This Document Relates To:
Adesanya, et al v. General Motors, LLC, 16-CV-925
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ORDER

JESSE M. FURMAN, United States District Judge:

The Court has received a letter, attached as Exhibit A, from alleged class member Khadijah Ahmad, appearing to request an update on the status of her claim. Ahmad appears to be a named plaintiff in Case No. 16-CV-925, although the status of her claims, if any, is somewhat unclear. Co-Lead Counsel shall promptly take steps to address the Ahmad's concerns and shall file a letter updating the Court on such efforts **within 30 days**. If Ahmad is still represented by counsel, Co-Lead Counsel should notify her counsel to address her concerns, and her counsel shall file a letter updating the Court by the same deadline. Co-Lead Counsel shall serve a copy of this order on the class member at the address provided.

SO ORDERED.

Dated: December 3, 2021
New York, New York



JESSE M. FURMAN
United States District Judge

Attachment A

Honorable Jesse M. Furman
40 Foley Square
New York, NY 1007

Your Honor I am reaching out to you in hopes that you can get me some answers regarding the GM Ignition Switch Settlement. Archer Systems oversee keeping the clients updated. I have been reaching out to them for a few years now and the only answer I have been getting is we are working on a final demand from Blue Cross Blue Shield of Michigan. I in fact know that it only takes 180 days for a final demand and when I told them this I was hung up on, and numerous times after that I tried calling and they would just pick up the telephone and hang it up or answer and automatically put me on hold without a greeting. One time I was on hold for 3 hours and 27 minutes before I hung up and never to be called back. When I am lucky to call and get through when calling from another telephone number when they find out it is me, they say I will have a supervisor call you back which has never happened. I have left messages for a dozen supervisors that have not called me back. Bob Black, Diana, Crystal Williams Eduardo, and Monica to name a few. Monica did call me back one time and so did Crystal but neither followed up like they said they would. I am trying to get some closure to this matter. I received documentation from them in November of 2018 with a timeline of when this should be completed, and it is 2021 and I am still getting the same answers that I was getting in October of 2019. I have included a copy of that timeline that came from Archer Systems. I have complied with every timeline they have sent me for information to be returned to them. I just want straight answers regarding the case and to my questions.

Any assistance in this matter will be helpful. I appreciate your time and I am sorry to bother you.

Khadijah Ahmad
Re: Estate of Qadir Ahmad
15861 Washburn St.
Detroit, MI 48238



We are writing to you regarding your claim submitted in connection with the potential settlement of claims related to alleged defects in GM ignition switches in certain GM vehicles.

Enclosed is a short Lien Questionnaire about your health insurers that must be completed and returned, along with copies of the insurance documents listed below, in order for your claim to be processed.

In connection with settlements of personal injury cases, government and private health insurers who have paid for medical expenses related to the claimed injury may assert a right to reimbursement for some or all of those payments out of any settlement amount paid to a claimant. These claims are called liens. The health insurers who may assert liens include governmental insurers such as Medicare and Medicaid, as well as private health plans provided by an employer, or a health insurance policy purchased privately (collectively "Private Health Insurers"). They also may include health care coverage from Medicare Advantage plans, which are private health insurance companies providing Medicare benefits through Medicare and are referred to as Medicare Part C plans. The health insurers' liens may arise from the terms and conditions of the insured person's contract with the health insurer. Under those terms, a person covered by the health insurance may have an obligation to notify their health insurer(s) of their claims and all relevant details relating to any settlement (i.e., total settlement, litigation expenses and anticipated net recovery). Failure to do so may result in serious consequences, including discontinuation or loss of coverage, or the insurer bringing a lawsuit against a claimant to recover the amount of the asserted lien. If you have questions about health insurer liens, you should contact your primary counsel Brent Coon and Associates.

As part of the settlement process, your attorneys and General Motors LLC agreed to appoint a Lien Administrator, Archer Systems, LLC (formerly known as Shapiro Settlement Solutions), that is responsible for identifying and resolving the liens of all claimants participating in the settlement, including identifying asserted lien charges that are incorrect and, where possible, obtaining discounts on the amount of the lien(s). The enclosed GM Ignition Switch Lien Questionnaire and the documents that you provide in response to this letter will be used by Archer Systems in connection with their work, and Archer Systems will reach out to you directly if any follow-up is required.

As you will see, the enclosed Lien Questionnaire requests information regarding your claimed GM Ignition Switch-related injuries and other medical and personal information, including your Social Security Number. Other than for the lien resolution purposes required by the settlement, Archer Systems will hold your private information in the strictest confidence. Only after a participating insurer agrees to appropriate terms and conditions, including with respect to confidentiality, will Archer Systems provide that insurer with the names or other information of any Claimants.



For the first section of the Lien Questionnaire, please complete with the Claimant's information, as well as the information for the Claimant's Representative, if applicable.

For the second section, labeled "Claimant's Health Insurance Information", please fill these questions out to the best of your ability. Please note, if you are a representative filling out this questionnaire on behalf of a claimant, please fill out this section of the questionnaire with the claimant's information.

For the third section, labeled "VA/Tricare/IHS Insurance Information", please fill these questions out to the best of your ability. This section is for any Military/Tricare/Indian Health Services/or VA insurance that you/the claimant had from the date of the accident to present. Please note, if you are a representative filling out this questionnaire on behalf of a claimant, please fill out this section of the questionnaire with the claimant's information.

For the fourth section, labeled "Other Health Insurance Information", please fill these questions out to the best of your ability, indicating any additional insurers that you have had since the date of your accident. Please note, if you are a representative filling out this questionnaire on behalf of a claimant, please fill out this section of the questionnaire with the claimant's information.

In addition to completing the enclosed Lien Questionnaire, we need for you to provide copies of the following health insurance documents:

- Health Insurance Card(s): Please send us a copy of your health insurance card(s).
- Health Insurer Correspondence Regarding Liens or Claims: If any health insurer (or other entity) has sent you any correspondence regarding any lien or claim, or has otherwise inquired about your GM Ignition Switch claims and/or any potential settlement(s), it is important that you provide us with a copy of the correspondence. This will let Archer Systems perform a review to determine if any claimed lien is valid, and if so, in what amount. Any additional correspondence you receive also should be provided to us. If you see asserted lien charges that you believe to be incorrect or high, please let us know so that Archer Systems can work towards removal or reduction of that charge.

Please return the Lien Questionnaire and your health insurance documents in the enclosed return envelope within the next two weeks. We appreciate your attention to these matters, which are necessary for the Lien Administrator, Archer Systems, to resolve liens on your behalf as part of the settlement process. If you have any questions, please contact Archer Systems at 800-872-4420. A representative from Archer Systems may be in touch to follow-up.

Sincerely,
Archer Systems, LLC

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agreement. During the initial phases of the process, Archer Systems will evaluate your required documents and determine if any records are deficient or incomplete and may contact you to obtain additional or missing information necessary to proceed with your settlement. You will receive correspondence throughout the process from Archer Systems as it relates to claim updates, form deadlines, and any critical information as it relates to your settlement. Upon receipt of final release and approval from the court, Archer Systems will be responsible for the distribution of your settlement funds.

The attached packet of information comes with instructions which will assist you in completing the Confidentiality Agreement, Lien Questionnaire and Authorizations. **Should you have any questions regarding any information contained in any of these items, please contact Archer Systems at 1-800-872-4420.** Otherwise, please return the originally signed Confidentiality Agreement, Lien Questionnaire and Authorizations to Archer Systems in the enclosed self-addressed, postage-paid envelope.

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The general time-line for this process will be:

- Sending out and return of Confidentiality Agreements, Lien Questionnaires and Authorizations – Deadline is December 31, 2018
- Letter from the Special Master with initial allocations – February, 2019
- Release forms to be mailed to Claimants – March, 2019
- Release deadline – Summer, 2019
- Payment process – Late Summer, 2019

To keep this time-line it is critical that you promptly return all documentation sent to you in order to avoid delays in the process.

As always, we greatly appreciate the opportunity to represent you in this matter.

DO NOT WAIT!!! FAILING TO TIMELY COMPLETE AND EXECUTE THE CONFIDENTIALITY AGREEMENT, CLAIMANT VERIFICATION FORM, AND AUTHORIZATIONS WILL ELIMINATE YOU FROM RECEIVING A SETTLEMENT OFFER.

Very truly yours,



Matthew R. Willis
Attorney at Law